

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

JOHN C. VOTTA, JR.,
Plaintiff,

v.

PETER J. SENNOTT, et al.
Defendants.

Civil Action No. 04-10135-GAO

DEFENDANT COAKLEY'S MOTION
FOR ENLARGEMENT OF TIME TO RESPOND TO COMPLAINT

Defendant Martha Coakley, Middlesex District Attorney, through counsel, respectfully requests that this Court enlarge the time to answer or otherwise respond to the complaint in this action and to extend the deadline to respond to March 18, 2004. In support thereof, Defendant Coakley states that:

1. The complaint in this action was filed on January 21, 2004;
2. Service of process was accomplished by delivery to the Middlesex District Attorney's Office on January 27, 2003;
3. Undersigned counsel has just been assigned to this case;
4. Defendant therefore requires a brief additional time to prepare an appropriate response to plaintiff's complaint;

For these reasons, defendant Coakley respectfully requests that this motion be allowed, and that time to respond to plaintiff's complaint be extended to March 18, 2004.

Local Rule 7.1(A)(2) Certificate

The undersigned counsel, Cathryn Neaves, attempted to confer with the plaintiff, but was unable to speak with him before filing this motion.

Respectfully submitted,

THOMAS F. REILLY
ATTORNEY GENERAL

David M. Lieber (by C.A.N.)
David M. Lieber (BBO# 653841)
Assistant Attorney General
Criminal Bureau
One Ashburton Place
Boston, Massachusetts 02108
(617) 727-2200 ext.2827

Dated: February 13, 2004

ATTORNEYS FOR DEFENDANT COAKLEY

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served on February 13, 2004, by depositing the copy in the office depository for collection and delivery by first-class mail, postage prepaid, to: John C. Votta, Jr., 505 Douglas Road, Lowell, Massachusetts 01852.

Cathryn A. Neaves
Cathryn A. Neaves